275 Battery Street, Suite 2000

Gordon & Rees LLP

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1	<u>RECITALS</u>	
2	WHEREAS the trial date in this matter is currently set for April 17, 2017;	
3	WHEREAS the deadline for completion of all non-expert discovery is October 14, 2016;	
4	WHEREAS Plaintiff's counsel recently propounded a substantial amount of discovery or	
5	Defendants, which Defendants need additional time to respond to;	
6	WHEREAS the parties need additional time to conduct fact discovery;	
7	WHEREAS the pleadings are not settled as the Court has not yet ruled on Defendants'	
8	Motion to Dismiss Portions of Plaintiff's First Amended Complaint;	
9	WHEREAS the Court's ruling on Defendant's Motion to Dismiss may impact the	
10	discoverable issues in this matter;	
11	WHEREAS the parties would suffer prejudice if the fact discovery cut-off date is not	
12	continued in light of the outstanding discovery needed;	
13	WHEREAS extending the fact discovery cut-off date will not impact any of the other	
14	deadlines in the Court's scheduling Order.	
15	STIPULA	ATION
16	THEREFORE, IT IS HEREBY STIUPLATED THAT the fact discovery cut-off deadline	
17	in this matter is continued for approximately thirty (30) days from October 14, 2016, until	
18	November 14, 2016.	
19	11	
20	Dated: August 16, 2016	GORDON & REES LLP
21		By: /s/Jennifer M. Lynch
22		Alyson S. Cabrera Jennifer M. Lynch
23		Attorneys for Defendants
24	Dated: August 16, 2016	LEIGH LAW GROUP
25		
26		By: /s/Jay T. Jambeck
27		Jay T. Jambeck Mandy Leigh Attorneys for Plaintiff
		Audineys for Flamuin

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[PROPOSED]-ORDER

It is hereby ordered that the fact discovery cut-off deadline in this matter is continued from October 14, 2016, until November 14, 2016.

IT IS SO ORDERED.

Dated: August 16, 2016

